

JOHN ASHCROFT  
Governor

G. TRACY MEHAN III  
Director



STATE OF MISSOURI  
DEPARTMENT OF NATURAL RESOURCES

DIVISION OF ENVIRONMENTAL QUALITY

Macon Regional Office  
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Macon, MO 63552  
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Division of Energy  
Division of Environmental Quality  
Division of Geology and Land Survey  
Division of Management Services  
Division of Parks, Recreation,  
and Historic Preservation

CERTIFIED MAIL  
P 461 505 661.

3.800 Marion  
Knapheide Mfg. Co.

LOW #91-NE.007

April 5, 1991

Mr. Harold Huggins  
Manufacturing Engineering Manager  
Knapheide Manufacturing Co.  
436 S. 6th St.  
Box C140  
Quincy, IL 62306

Dear Mr. Huggins:

Enclosed is a copy of Resource Conservation and Recovery Act and Missouri Hazardous Waste Management Law Compliance Evaluation Inspection Report, which I believe is self-explanatory. Please direct your attention to the recommendations in the report.

A large number of unsatisfactory features are indicated in the report and recommendations are made for their correction. Please respond in writing to each of the items no later than May 5, 1991 (30 days). Your response to each recommendation or unsatisfactory feature should be very specific and should indicate how each item has been corrected and what action has been taken to prevent the reoccurrence of the deficiency. Supporting documents such as copies of recent manifests, land ban notification, personnel training documents, contingency plan update, memos to staff, etc., should be included to document return to compliance. All responses should be

RECEIVED  
APR 09 1991  
WASTE MANAGEMENT PROGRAM  
MISSOURI DEPARTMENT OF  
NATURAL RESOURCES



R00000368  
RCRA Records Center

Mr. Harold Huggins  
April 5, 1991  
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sent to our Northeast Regional Office with a copy to the Hazardous Waste Enforcement Unit, Waste Management Program, P.O. Box 176, Jefferson City, MO 65102.

If you have questions concerning the report, please contact Sam Wilson in our Northeast Regional Office in Macon.

Sincerely,

NORTHEAST REGIONAL OFFICE



Charles S. Decker, P.E.  
Regional Administrator

CSD/SW/lis

Enclosure

cc: Waste Management Program ✓  
Mark Twain Regional Council of Governments

RESOURCE CONSERVATION & RECOVERY ACT  
AND  
MISSOURI HAZARDOUS WASTE MANAGEMENT LAW  
COMPLIANCE EVALUATION INSPECTION REPORT

Facility

Knapheide Manufacturing Co.  
Highway 24  
West Quincy, MO

EPA ID: MOD000766998  
MO Generator ID: 004809

Mailing Address:

436 S. 6th Street  
Box C140  
Quincy, IL 62306

Participants

Knapheide Manufacturing Co.

Mr. Harold D. Huggins  
Manufacturing Engineering Manager

Mr. Jim Rubottom  
Director of Human Resources

Missouri Department of Natural Resources

Mr. Don Head  
Environmental Specialist  
Northeast Regional Office

Mr. Sam Wilson  
Environmental Specialist  
Northeast Regional Office

Introduction

An inspection was conducted of the hazardous waste management activities at the Knapheide Manufacturing Co. plant located in West Quincy, Missouri on March 15, 1991. The visit was to determine compliance with the Missouri Hazardous Waste Management Law (MHWML) and regulations and the federal Resource Conservation and Recovery Act (RCRA) and regulations. The inspection was conducted under authority of Sections 260.375(9) and 260.377 RSMo.

Facility Description

The Knapheide Manufacturing Co. plant in West Quincy, Missouri manufactures truck beds, utility bodies and tool boxes. Steel members are cut, shaped, and welded to form the framework for a truck bed. Yellow pine lumber is tongue and grooved and cut to fit the framework. The entire unit is primed and painted with an alkyd enamel. The utility bodies and toolboxes are assembled, welded, and primed prior to shipping. Metal components are steam cleaned with an alkalide cleaning solution supplied by Detrex.

The Knapheide plant is registered as a large quantity generator of hazardous waste. The largest waste stream is waste xylene, which is currently being

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generated at approximately 500 gallons per month. The waste solvent is generated from the cleaning of the painting equipment. It is being transported by Schiber Truck Company, Inc. (ILD006493191; H-1427) to Continental Cement Company (MOD054018288; R188) to be utilized in a supplemental fuels program. A small quantity of waste oil being generator is mixed with the waste xylene and handled in the same manner.

Waste paint related material is also generated periodically. Records indicate an average generation rate of approximately 36 gallons per month. This waste is shipped by Schiber Truck Company, Inc. to Petro-Chem (MID980615298) at Detroit, Michigan. At the time of inspection there was no waste paint related material in storage.

Unsatisfactory Features

1. Hazardous waste manifests for out of state shipments (including manifest #91021) did not include the Missouri hazardous waste manifest document number as required by Missouri Hazardous Waste Management Commission (MHWMC) Regulation 10 CSR 25-5.262(2)(B)2A.
2. Hazardous waste manifests (including manifest #91020 and 91021) did not include the license plate number for the waste-carrying portion of the vehicle used to transport waste, including the state of registration as required by MHWMC Regulation 10 CSR 25-5.262(2)(B)2C.
3. Hazardous waste manifests for out of state shipments (including manifest #91021) did not include the transporter's Missouri ID number as required by MHWMC Regulation 10 CSR 25-5.262(2)(B)2D.
4. Hazardous waste manifests for wastes measured in gallons (including manifest #91020 and 91021) did not include the specific gravity for the wastes as required by MHWMC Regulation 10 CSR 25-5.262(2)(B)2I.
5. Hazardous waste manifests (including manifest #91020 and 91021) did not include an alternate designated facility or instructions to the transporter to return the waste to the generator if it is undeliverable as required by MHWMC Regulation 10 CSR 25-5.262(2)(B)2 referenced to 40 CFR 262.20(c) and (d).
6. The generator did not have documentation that he has provided an appropriate land ban notification with each shipment of waste which is subject to land disposal restrictions as required by 40 CFR 268.7.
7. Personnel training documents did not include documentation of the hazardous waste director's qualifications or training as required by MHWMC Regulation 10 CSR 25-5.262(2) referenced to 40 CFR 262.34(a)(4) which references 40 CFR 265.16(d)(4).

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8. Adequate aisle space to allow unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment in an emergency was not maintained in the hazardous waste container storage area as required by MHWMC Regulation 10 CSR 25-5.262(2) referenced to 40 CFR 262.34(a)(4) which references 40 CFR 265.35.
9. The contingency plan includes outdated information and needs to be updated as required by MHWMC Regulation 10 CSR 25-5.262(2) referenced to 40 CFR 262.34(a)(4) which references 40 CFR 265.54.
10. The generator did not determine that the waste paint filters were a hazardous waste in a timely manner as required by MHWMC 10 CSR 25-5.262(2) referenced to 40 CFR 262.11.

Comments

This inspection included an opening conference, records review, facility tour and closing conference on March 15, 1991. After receiving complete laboratory analysis for the paint filters, another visit was made to the facility on March 28, 1991 to verify information on the paint filters. Mr. Harold Huggins, manufacturing engineering manager, was present during both visits and supplied information for the inspection.

Missouri state regulations require that certain information, in addition to that required by federal regulation, be included on each hazardous waste manifest. Each manifest must include the transporter's Missouri ID number, the license plate number and state of issue for the waste-carrying portion of the vehicle used to transport the waste, the specific gravity for wastes reported in gallons, liters, or cubic yards, and the Missouri hazardous waste manifest document number. This document number consists of the six digit Missouri generator identification number and the consecutive shipment number. This information was not included on a number of hazardous waste manifests including manifest numbers 91020 and 91021 (attached).

Manifests including numbers 90120 and 91021 did not list an alternate designated facility or instructions for the transporter in case the waste cannot be delivered to the first designated facility. One of these pieces of information must be included on the manifest in case unforeseen circumstances make delivery to the designated facility impossible.

With each shipment of hazardous waste that is restricted from land disposal, an appropriate land ban treatment standards notification must be sent to the receiving facility. This notification is to accompany the manifest and a copy should be kept by the generator to document that they have met the requirements. Mr. Huggins reported that Knapheide sends an appropriate notification with each shipment, but they have failed to keep copies of the notifications.

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The liquid hazardous waste is stored in a dedicated building that is designed to meet the state requirements for liquid hazardous waste storage. It was reported that anyone working in the building is provided with a two-way radio for emergency communications. The drums were placed in this building in a manner that restricts the unobstructed movement of personnel and equipment. Adequate aisle space must be provided to allow unobstructed movement of personnel, fire protection equipment, spill control equipment, etc. in an emergency.

Mr. Huggins is now acting in the capacity of the hazardous waste director. Personnel training document maintained at the facility did not include Mr. Huggins qualifications or training that qualifies him for this role.

During the opening conference, Mr. Jim Rubottom was introduced as the emergency coordinator. However, in reviewing the contingency plan, it was found that Mr. Steve Meckes is still listed as the emergency coordinator. The contingency plan needs to be updated to include current staff and any other changes that have been made.

At the time of inspection the management of the waste paint filters and overspray papers was discussed. Mr. Huggins reported that at one time they had treated the filters as ignitable hazardous waste. These wastes, prior to September 25, 1989, had been burned in an on-site Brule incinerator. However, on that date the incinerator was found to be in unusable condition and Knapheide was issued a Notice of Violation for open burning of ignitable hazardous waste. Knapheide was advised to cease burning the material on site and to make arrangements for its proper disposal. Mr. Huggins explained that since that time Knapheide has been working with Brule incinerator representatives towards replacing the existing incinerator and has been advised by those representatives that the material should not be considered an ignitable hazardous waste.

Mr. Huggins produced page 2 of 2 of a laboratory analysis from SCI Environmental, Inc. indicating Sample Number - 4310, Sample Identity-Composite, and Ignitability (degrees F.) - >200. The analysis was signed by Elizabeth M. Cohoon, laboratory manager, and was dated 3/12/91. Mr. Huggins explained that based on this analysis the material is not an ignitable hazardous waste. Since the analysis sheet observed did not adequately describe the sample analyzed, Mr. Huggins agreed to fax the complete analysis report to the inspector's office, as the rest of the report was in his office in Quincy, Illinois. After receiving the complete analysis report it was noted that the Toxicity Characteristic Leaching Procedure (TCLP) was also conducted on the sample. This analysis reported chromium at 6.25 ppm. The regulatory limit for chromium is 5.0 ppm. Therefore, this waste should be classified as a D007 characteristic hazardous waste. A follow-up visit was made to the facility on March 28, 1991 to observe how this waste has been handled. Knapheide has handled the waste as non-hazardous since it ceased burning the waste in September 1989. There are currently over 600 55 gallon drums of the waste stored on site. The material has not been stored or labeled as hazardous

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waste. Mr. Huggins indicated that the only paint line that contains chromium is the "vinyl-wash" line and that he now intends to have the filters from each line analyzed separately in an attempt to minimize the amount that will have to be handled as hazardous. He also said they are contemplating changing to a primer that does not contain chromium.

Federal regulations require that a generator determine if his waste is hazardous. Although Knapheide has been generating this waste for several years and has been storing it since September 1989, Knapheide had failed to determine if the paint filter waste was hazardous until the time of inspection. An accurate hazardous waste determination should be made at the time a waste stream begins to be generated. The paint filter waste must now be handled as a hazardous waste.

Recommendations

1. That all hazardous waste manifest include the Missouri hazardous waste document number as required by MHWMC Regulation 10 CSR 25-5.262(2)(B)2A.
2. That all hazardous waste manifests include the license plate number and state of issue of the waste-carrying portion of the transporting vehicle as required by MHWMC Regulation 10 CSR 25-5.262(2)(B)2C.
3. That all hazardous waste manifests include the transporter's Missouri ID number as required by MHWMC Regulation 10 CSR 25-5.262(2)(B)2D.
4. That all hazardous waste manifests for waste reported in gallons, liters, or cubic yards include the specific gravity for the wastes as required by MHWMC Regulation 10 CSR 25-5.262(2)(B)2I.
5. That all hazardous waste manifests include an alternate designated facility or instructions to the transporter to return the wastes to the generator if it is undeliverable as required by MHWMC Regulation 10 CSR 25-5.262(2) referenced to 40 CFR 262.20(c) and (d).
6. That the generator maintain documentation at the facility that an appropriate land disposal restrictions notification has been provided to the designated facility with each shipment of waste subject to the land disposal restrictions as required by 40 CFR 268.7.
7. That personnel training documents kept on site include documentation of the hazardous waste director's qualifications or training as required by MHWMC Regulation 10 CSR 25-5.262(2) referenced to 40 CFR 262.34(a)(4) which references 40 CFR 265.16(d)(4).
8. That adequate aisle space be provided in all areas as required by MHWMC Regulation 10 CSR 25-5.262(2) referenced to 40 CFR 262.34(a)(4) which references 40 CFR 265.35.

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9. That the contingency plan be updated to include current information as required by MHWMC Regulation 10 CSR 25-5.262(2) referenced to 40 CFR 262.34(a)(4) which references 40 CFR 265.54.
10. That the generator determine if each waste stream is hazardous as required by MHWMC Regulation 10 CSR 25-5.262(2) referenced to 40 CFR 262.11 at the time that the waste stream generation begins.
11. That Knapheide comply with all provisions of MHWMC Regulation 10 CSR 25-5.262(2) referenced to 40 CFR Part 262 concerning the hazardous waste paint filters and overspray papers and submit written documentation to the Department of Natural Resources showing the material was properly disposed of within 30 days of receipt of this report.

SUBMITTED BY:

Sam Wilson

Sam Wilson  
Environmental Specialist IV  
Northeast Regional Office

SW/lis



## LARGE QUANTITY GENERATOR CHECKLIST

Form LQG-INSP  
(10-15-88)Name of Facility: Knapheide Manufacturing CoDate: 3-15-91Address: West Quincy, Mo  
436 S. 6th Street, Box C140  
Quincy IL 62306Other Inspections Done:  
RR      TRANS      LDR X  
OTHER     Phone: (217) 222-7131 MO ID# 04809EPA ID# MO D000766798Facility Representative: Harold HugginsTitle: Plg. Engineering Manager

Briefly describe manufacturing process(es). (Use continuation sheet, if needed.)

Facility manufactures truck platform beds, utility bodies and  
tool boxes for trucks. Lumber is tongue & grooved. Sheet metal  
is fabricated off site and shipped to generator for assembly. Products  
are assembled, welded, primed &/or painted and shipped.

List of wastes generated. (Use continuation sheet, if needed.)

<u>Waste</u>	<u>Amount/Month</u>	<u>Disposition</u>
1. <u>Waste Paint Related Material</u>	<u>167 kg/month</u>	<u>Petro Chem, Detroit</u>
2. <u>Waste Xylene Mixture</u>	<u>1582 kg/month</u>	<u>Continental Cement Co.</u>
3. <u>Waste Oil</u>	<u>1582 kg/month</u>	<u>Continental Cement Co.</u>
4. <u>Waste Paint Filters</u>	<u>1582 kg/month</u>	<u>Continental Cement Co.</u>
5. <u>    </u>	<u>    </u>	<u>    </u>

A. MANIFESTS AND RECORDKEEPING 10 CSR 25-5.262(2) AND 5.262(2)(B) AND 10 CSR 25-5.262(2) AND 5.262(2)(C)2 AND 3

Generator's MO and EPA I.D. Numbers. . . . . ( )

Manifest document number MO I.D. & Shipment # . . . . . ( )

EPA Waste I.D. codes . . . . . ( )

Generator's name, address, phone # . . . . . ( )

All Transporters' names, phone #'s MO and EPA I.D. #'s . . . . . ( )

Designated facility name, address, phone # and MO and EPA I.D. # . . . . . ( )

Proper DOT Shipping Name, Hazard Class and I.D. # . . . . . ( )

Containers, Quantity and Unit Wt/Vol being shipped properly designated. . . . . ( )

Proper certification including waste minimization. . . . . ( )

Manifest properly signed and dated . . . . . ( )

No more than 10 days time between generator and facility signatures. . . . . ( )

Manifests returned within 35 days. . . . . ( )

If not, exception generator report submitted within 45 days. . . . . ( )

Completed manifests and Summary Manifest Report and Certification. . . . . ( )

Spills of reportable quantities reported to DNR. . . . . ( )

Vehicle lic # &amp; state . . . . . ( )

Directions if undeliverable . . . . . ( )

B. PRETRANSPORT, CONTAINERIZATION AND LABELING 10 CSR 25-5.262(2) AND 5.262(2)(C)2 AND 3

Waste Packaged, marked and labeled per DOT during entire on-site storage period and prior to transport. . . . . ( )

Placards available for use by transporters . . . . . ( )

Satellite accumulation requirements met (if applicable). . . . . ( )

a. Stored in satellite areas less than 1 year. . . . . ( )

b. Containers marked identifying contents and beginning date . . . . . ( )

c. Containers kept closed/compatible/good condition. . . . . ( )

d. Quantities accumulated not exceeding 55 gal. (1 qt. acutely hg. waste). . . . . ( )

C. STORAGE STANDARDS 10 CSR 25-5.262(2) AND 5.262(2)(C)2 AND 3

Facility inspected and maintained. . . . . ( )

Date of accumulation marked. . . . . ( )

Storage less than 90 days (unless small quantity generator). . . . . ( )

D. CONTAINER STORAGE 10 CSR 25-5.262(2) AND 5.262(2)(C)2

Containers in good condition . . . . . ( )

Containers kept closed in storage. . . . . ( )

Containers storing incompatible waste separated or protected from each other. . . . . ( )

Containers of ignitable or reactive waste stored &gt; 50 feet from property line . . . . . ( )

Containers stored within a containment system (if applicable) meeting criteria of 10 CSR 25-5.262(2)(C)2.B. . . . . ( )

E. STORAGE TANKS 10 CSR 25-5.262(2) AND 5.262(2)(C)2.C.  
(See tank checklist)

F. PERSONNEL TRAINING 10 CSR 25-5.262(2)

Documentation of hazardous waste director's qualifications or training. ☒   
Completed classroom or on-the-job training. . . . . ☒   
Job title, description, and name of person filling position . . . . . ☒   
Written record of the type and amount of training given . . . . . ☒   
Documentation confirming that training has been given . . . . . ☒

-not on file

Update Scheduled  
Training by Locton  
KC.

G. PREPAREDNESS AND PREVENTION 10 CSR 25-5.262(2) AND 5.262(2)(C)2.E.

Internal communication or alarm system. . . . . ☒   
Device in the hazardous waste operation area capable of summoning emergency assistance. . . . . ☒   
Fire control, spill control, and decontamination equipment available. . ☒   
Adequate water supply for fire control equipment. . . . . ☒   
Adequate and proper safety equipment available. . . . . ☒   
Adequate aisle space. . . . . ☒   
Arrangements with local emergency agencies. . . . . ☒

- Two way Radio

in H.W. Storage area

H. CONTINGENCY PLAN AND EMERGENCY PROCEDURES 10 CSR 25-5.262(2)

Contingency Plan. . . . . ☒   
Detailed description of procedures that personnel must implement to respond to fires, explosions, or releases of hazardous waste. . . . ☒   
Describe formal arrangements with emergency agencies. . . . . ☒   
Name, addresses, and phone numbers (home & office) of emergency coordinators. . . . . ☒   
Emergency equipment including its description and location. . . . . ☒   
Evacuation plan if applicable . . . . . ☒

NEEDS to be updated

Lists Steve Meekes As  
Emg. Coord.

I. WASTE OIL 10 CSR 25-11.010

Written waste oil contract maintained . . . . . ☒   
Waste oil properly stored and transported . . . . . ☒

waste oil handled  
with waste xylene

COMMENTS: Jim Rubottom - Em Coord.

Facility did not determine that paint filters are a hazardous waste until pointed out by the inspector.

Inspector Signature & Title:

Sam Wilson

ESTV

Office:

NERO

IN COMPLIANCE

☒

IN VIOLATION OR  
ABSENT

☐

LAND DISPOSAL RESTRICTION CHECK  
FOR P-SOLVENT AND DIOXIN WASTES

Facility: Kuapheide Mfg. Co

Date: 3/15/91

C. TREATMENT/STORAGE FACILITY REQUIREMENTS

N/A

Box C140

Quincy, IL 62306

Missouri I.D.#: 04809

Facility Representative: Harold Huggins

EPA I.D.#: MO0000766998

Title: Mfg. Engineering Manager

Phone #: (217) 222-7131

Facility Status: Large Quantity Generator ☒  
Small Quantity Generator ☐  
Treatment/Storage Facility ☐  
Land Disposal Facility ☐  
Permitted ☐

A. GENERAL

1. Specify the wastes handled by the facility which are subject to the land disposal restrictions:

EPA Waste Code (FOOI)

Waste Description

- a. FO03, FO05  
b. FO03, FO05  
c. FO03, FO05  
d. FO03, FO05

Waste Paint Related Material

Waste Xylene Mixture

Are these wastes properly classified? Yes ☒ No ☐

2. Which, if any, of the following exemptions or extensions apply to this facility?

- Two-year national capacity extension of the effective date for solvent wastes generated by small quantity generators (268.30) ☐  
- Two-year statutory exemption for solvent wastes generated from RCRA corrective or CERCLA Section 104 and 106 response actions (268.30) ☐  
- Two-year national capacity extension of the effective date for solvent-water mixtures, solvent-containing sludges, or solvent-containing soil (non-CERCLA/RCRA corrective action) containing less than 1% total FO01-FO05 solvent constituent, (268.30) ☐  
- Other, specify (268.4, 268.5, 268.6, 268.31, 268.44) ☐

3. Has the facility used dilution of a restricted waste as a substitute for adequate treatment to achieve compliance (268.3)?

yes ☐ no ☒

4. List facilities to which off-site shipments of restricted wastes have been sent and/or from which shipments have been received.

- a. Petro Chem  
b. Continental Cement Co.

B. GENERATOR REQUIREMENTS

1. Generator has adequately tested his wastes using the TCLP, or applied knowledge, or both. (268.7(a)).....(✓)  
2. Generator has determined the appropriate treatment standards for his restricted wastes. (268.7 and Subpart D).....(✓)  
3. The generator is not sending restricted waste to a land disposal facility for direct land disposal without treatment.....(✓)  
4. a. If restricted wastes require treatment prior to land disposal, then the generator has provided notification to the treatment facility with each off-site shipment. (268.7(a)).....(✓)  
b. If restricted wastes do not require treatment prior to land disposal, then the generator has provided a notification and certification to the LDF that the wastes meet all applicable treatment standards and prohibitions (268.7(a)).....(✓)  
- Certifications properly worded.....(✓)  
5. If the generator's restricted waste is subject to any exemptions or extensions, then the generator has sent notices with each

1. The facility is not sending restricted waste to a land disposal facility for direct land disposal without treatment.....(✓)  
2. The treatment facility has adequately tested its treatment residues using TCLP, or applied knowledge, or both to determine whether or not they meet the applicable treatment standards specified in 268.41 (268.7(b)).....(✓)  
3. The facility has modified its waste analysis plan to include the additional testing requirements of 268.7, referenced in 268.13 and 268.13.....(✓)  
4. a. If the waste treatment residues do not meet applicable treatment standards or prohibitions, and are sent to another treatment facility prior to land disposal, then the facility complied with the generator notification requirement of 268.7(a). (268.7(b)).....(✓)  
b. If the treatment residue does not require further treatment prior to land disposal, then the facility submitted to the LDF with each shipment of waste residue a certification that the waste is in compliance with applicable treatment standards. (268.7(b)).....(✓)  
- Certifications properly worded.....(✓)  
5. The facility's written operating record has been modified, and now includes the documentation required by 264.73(b)(3)(10)(11)(12) or 265.73(b)(3)(8)(9)(10).....(✓)  
6. If the facility has stored restricted wastes for greater than one year, then it can satisfactorily demonstrate that the storage has been for the purpose of accumulating an amount necessary to facilitate proper recovery, treatment or disposal (268.50)....(✓)  
7. If the treatment facility is permitted, it has made the necessary minor modifications to its permit to allow it to treat restricted wastes not previously specified in the permit (270.42(0)).....(✓)

D. LAND DISPOSAL FACILITY REQUIREMENTS

N/A

1. The facility is not land disposing restricted wastes.....(✓)  
2. The land disposal facility has records of notifications and certifications submitted by all applicable generators and storage and treatment facilities for each shipment of waste or waste treatment residue accepted for land disposal. (268.7(c)).....(✓)  
3. The LDF has modified its waste analysis plan in accordance with the additional requirement of 268.7, referenced in 264.13 and 265.13.....(✓)  
4. The LDF has adequately tested the wastes received using TCLP, applied knowledge, or both. (268.7(c)).....(✓)  
5. The facility's written operating record has been modified, and now includes the documentation required by 264.73(b)(3)(10)(13)(14) or 265.73(b)(3)(8)(11)(12).....(✓)

COMMENTS: Generator does not have documentation that land ban notification has been sent with each shipment.

Please mark boxes as shown (✓) in compliance ( ) in violation

Inspector's Signature Sam Wilson

Title ES-IV

Office NERO

DNR

MICHIGAN DEPARTMENT  
OF NATURAL RESOURCES

DO NOT WRITE IN THIS SPACE

ATT. ☐ DIS. ☐ REJ. ☐ PR. ☐1979, as amended and Act 136, PA  
1969.Failure to file is punishable under  
section 299 548 MCL or Section 10 of  
Act 136, PA, 1969.

Please print or type.

Form Approved. OMB No. 2050-0039 Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. M 10 D 0 0 0 7 6 6 9 9 8		Manifest Document No. 977021		2. Page 1 of 1		Information in the shaded areas is not required by Federal law.							
3. Generator's Name and Mailing Address Knapheide Manufacturing Company Highway 24 West; West Quincy, MO 63471						A. State Manifest Document Number MI 2139260									
4. Generator's Phone (217) 222-7131						B. State Generator's ID									
5. Transporter 1 Company Name Schiber Truck Company, Inc.						C. State Transporter's ID									
6. US EPA ID Number 11 D 0 0 0 6 4 9 3 1 9 1						D. Transporter's Phone 618-254-2514									
7. Transporter 2 Company Name						E. State Transporter's ID									
8. US EPA ID Number						F. Transporter's Phone									
9. Designated Facility Name and Site Address Petro-Chem 515 Lyncaste Detroit, MI 48214						G. State Facility's ID									
10. US EPA ID Number M I D 9 8 0 6 1 5 2 9 8						H. Facility's Phone 313-824-5835									
11. US DOT Description (including Proper Shipping Name, Hazard Class, and HM ID NUMBER).						12. Containers No. Type		13. Total Quantity		14. Unit Wt/Vol		1. Waste No. N/H			
a. "RQ" Waste Paint Related Material, Flammable Liquid, NA1263 (F003, F005)						006 D M		00330 G		F 0 0 3 F 0 0 5		H			
b.															
c.															
d.															
Additional Descriptions for Materials Listed Above Approval #W1165						K. Handling Codes for Wastes Listed Above a/ / b/ / c/ / d/ /									
15. Special Handling Instructions and Additional Information Bill to: Heartland Environmental EMERGENCY PHONE # 217-222-7134															
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.															
Printed/Typed Name ORVILLE NIEDERS						Signature Orville Nieders						Date Month Day Year 0 2 2 5 9 1			
17. Transporter 1 Acknowledgement of Receipt of Materials						Printed/Typed Name Gene Bough						Signature Gene Bough		Date Month Day Year 0 2 2 5 9 1	
18. Transporter 2 Acknowledgement of Receipt of Materials						Printed/Typed Name						Signature		Date Month Day Year	
19. Discrepancy Indication Space APR 09 1991															
20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted on Item 19. WASTE MANAGEMENT PROGRAM MISSOURI DEPARTMENT OF NATURAL RESOURCES															
Printed/Typed Name						Signature						Date Month Day Year			

INSTRUCTIONS FOR THE COM-  
PLETION OF THIS FORM ARE ON A  
SEPARATE SHEET.

THIS DOCUMENT MUST BE USED  
FOR ALL MISSOURI-DESTINED  
SHIPMENTS.

MISSOURI DEPARTMENT OF NATURAL RESOURCES

Division of Environmental Quality

Waste Management Program

P.O. Box 176 Jefferson City, Missouri 65102

314-751-3176

HAZARDOUS WASTE MANIFEST

EMERGENCY RESPONSE  
U.S. COAST GUARD  
1-800-424-8802  
CHEM TREC  
1-800-424-9300  
DEPT. OF NATURAL RESOURCES  
314-634-2436

Please print or type (Form designed for use on ellipse (12-pitch) typewriter.)

Form Approved, OMB No. 2050-0039, Expires 9-30-91

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator's US EPA ID No. MO0000766928	Manifest Document No. 1911020	2. Page 1 of 1	Information in the shaded areas is required by State law.
3. Generator's Name and Mailing Address Knapheide Manufacturing Company Highway 24 West, West Quincy, MO 63471		4. Generator's Phone 217-222-7131		A. Missouri Manifest Document Number 004809	
5. Transporter 1 Company Name Schiber Truck Company, Inc.		6. US EPA ID Number 118006493191		C. MO. Trans. ID H-1427	
7. Transporter 2 Company Name		8. US EPA ID Number		D. Transporter's Phone 618-254-2514	
9. Designated Facility Name and Site Address Continental Cement Company 3000 South Highway 79 Hannibal, MO 63401		10. US EPA ID Number MO000054018288		E. MO. Trans. ID R-188	
11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)		12. Containers		13. Total Quantity	14. Unit Wt/Vol.
a. "RQ" Waste Xylene Mixture Flammable Liquid, UN 1307 (F003, F005)		Number Type 0, 0, 1 TT		11467 G	EPA WASTE CODE F003 F005
b.					STATE
c.					STATE
d.					STATE
J. Additional Descriptions for Materials Listed Above		K. HANDLING CODE (FACILITY USE ONLY)			
a. Waste Paint and Thinner		INTERIM FINAL COMMENTS			
b.					
c.					
d.					
15. Special Handling Instructions and Additional Information Emergency Phone #					
16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and applicable state regulations. If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment. OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method available to me that I can afford.					
Printed/Typed Name		Signature		Month Day Year	
17. Transporter 1 Acknowledgement of Receipt of Materials		Signature		Date	
Printed/Typed Name		Signature		Month Day Year	
18. Transporter 2 Acknowledgement of Receipt of Materials		Signature		Date	
Printed/Typed Name		Signature		Month Day Year	
19. Discrepancy Indication Space					
20. Designated Facility Owner or Operator: Certification of receipt and handling of hazardous materials covered by this manifest except as noted in item 19.					
Printed/Typed Name		Signature		Date	

# GENERATOR'S HAZARDOUS WASTE REPORT SUMMARY SHEET

NOTE: PLEASE FLAG INSTRUCTIONS AND EITHER PRINT OR TYPE

Regardless of whether any off-site shipment occurred, as a registered generator of hazardous waste, you must complete, sign, and submit this form to the Department of Natural Resources.

NAME (LAST, FIRST, MIDDLE)	DATE OF BIRTH (MM/DD/YYYY)	DATE OF DEATH (MM/DD/YYYY)	CAUSE
JOHN EDGAR HOOVER	1-22-1895	5-2-1967	
JOHN EDGAR HOOVER	1-22-1895	5-2-1967	
JOHN EDGAR HOOVER	1-22-1895	5-2-1967	

SECTION 5: IDENTIFICATION OF FOREIGN DISSEMINATION OF INFORMATION

GENERATOR'S NAME		GENERATOR'S SERIAL NUMBER		GENERATOR'S USED NO.	
THE KNAUFHEIDE MFG. CO.		1000000766		998	
GENERATOR'S MODEL		TELEPHONE NUMBER		GENERATOR'S MODEL NO.	
FAROLE D. WILKINS		(212) 228-7131		000809	
PLANT ADDRESS		CITY	STATE	ZIP CODE	
436 S. 5TH ST.		QUINCY	IL	62306	
PLANT ADDRESS		CITY	STATE	ZIP CODE	
HIGHWAY 220		WEST QUINCY	MO	63471	
NAME OF FARMER/FAMILY		NAME USE ONLY			

11	12	13
SUBMITTED FOR INFO (complete part 2, attach 1. completed 2. to be added, esp. design, esp. 3. to be added, esp. design, esp.	REPORTABLE QUANTITY NOT REGENERATED 50% REGENERATION AVERAGE 50% TO 100%	REPORTABLE QUANTITY REGENERATED BUT NOT REGENERATED QUANTITY ENTERED 50% TO 100% REGENERATION AVERAGE 50% TO 100%

\*\*\*\*\*

14

RECEIVED  
APR 09 1991  
WASTE MANAGEMENT PROGRAM  
MISSOURI DEPARTMENT OF  
NATURAL RESOURCES

RECEIVED

APR 09 1997

WASTE MANAGEMENT PROGRAM  
MISSOURI DEPARTMENT OF  
NATURAL RESOURCES

I declare under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

PRINT NAME	SIGNATURE	DATE
HAROLD D. HUGHES	<i>Harold D. Hughes</i>	13-15-91
DD FORM 1007 (1-89)		DNB HWG:11





ENVIRONMENTAL, INC. LABORATORY SERVICES DIVISION

March 12, 1991

Mr. Harold Huggins  
Knapheide Manufacturing Company  
436 South Sixth Street, P.O. Box C-140  
Quincy, Illinois 62301

RE: Analytical Results  
SCIE No. 91-1034

Dear Mr. Huggins:

SCI Environmental, Inc. (SCIE) is pleased to submit results of analytical testing performed on the samples submitted on February 18, 1991. The samples were analyzed for TCLP; EPA Method 1311 and ignitability. There were no analytical problems encountered with the analysis.

If you have any questions or need further clarification, please do not hesitate to call.

Thank you for selecting SCI Environmental for your analytical testing needs.

Respectfully submitted,

*Elizabeth M. Cohoon*

Elizabeth M. Cohoon  
Laboratory Manager

EMC/jr/031291-2.1tr

Enclosure





ENVIRONMENTAL, INC. LABORATORY SERVICES DIVISION

DATA SUMMARY

Client: Knapheide Manufacturing Company  
435 South Sixth Street, P.O. Box C-140  
Quincy, Illinois 62301

Project No.: 91-1034

Sample Matrix: Filters

Date Sampled: 2/14/91

Sampled By: SCIE

Date Received: 2/18/91

Sample Location: Knapheide

Date Analyzed: 3/4/91

EPA Method No.: 1311

## TOXICITY CHARACTERISTIC LEACHATE PROCEDURE (TCLP)

SCIE Sample No.: 4310

Sample Identity: Paint Composite

Contaminant	Results (ppm)*	Regulatory Level (ppm)*
Arsenic	ND(**) < 0.1	5.0
Barium	0.19	100.0
Benzene	ND < 0.1	0.5
Cadmium	ND < 0.1	1.0
Carbon tetrachloride	ND < 0.01	0.5
Chlorobenzene	ND < 0.1	100.0
Chloroform	ND < 0.1	6.0
Chromium	6.2	100.0
Cuprous	< 10.0	200
Diethylstilbestrol	< 10.0	
1,4-Dichlorobenzene	0.5	
1,1-Dichloroethene	0.1	0.5
1,1-Dichloroethane	1.1	0.7
2,4-Dichlorobenzene	0.1	0.13
Hexachlorobenzene	ND < 0.1	0.13
Hexachlorobenzene	ND < 0.1	0.5
Hexachlorocyclopentadiene	ND < 0.1	1.0
Lead	ND < 0.1	5.0
Manganese	ND < 0.001	2
Methyl ethyl ketone	9	2.0
Nitrobenzene	ND < 0.5	2.0
1,2-Dichloroethane	ND < 0.1	100.0
Pyridine	ND < 2.0	5.0
Styrene	ND < 0.1	1.0
Sulfur	ND < 0.001	2.0
Tetrachloroethylene	ND < 0.1	0.7
Trichloroethylene	ND < 0.1	0.7
2,4,6-Trichlorophenol	ND < 10.0	100.0
2,4,5-Trichlorophenol	ND < 1.0	1.0
Vinyl chloride	ND < 0.1	0.2

\* ppm = parts per million

\*\*ND = none detected above method detection limit



ENVIRONMENTAL, INC. LABORATORY SERVICES DIVISION

Page 2 of 2

Sample Number	Sample Identity	Ignitability (degrees F)
4310	Composite	> 200

Submitted By:

3/12/91

Date

File: 1034TCLP.dta

Elizabeth M. Cohoon  
Elizabeth M. Cohoon  
Laboratory Manager